



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

April 30, 2012

Monica Schwalbach, Forest Supervisor
Wallowa-Whitman National Forest
P.O. Box 907
Baker City, Oregon 97814

Re: U.S. Environmental Protection Agency (EPA) review and comments for the Wallowa Whitman National Forest (WWNF) Travel Management Plan (TMP) Final Environmental Impact Statement (FEIS). EPA Project Number: 07-017-AFS

Dear Ms. Schwalbach

This review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Under our policies and procedures, we evaluate the environmental impact of the proposed action and the adequacy of the impact statement.

In our September 17, 2009 comments, we noted our disagreement with the Draft EIS's general conclusion that all alternatives are consistent with Clean Water Act requirements. To address this concern, we recommended that the FEIS incorporate additional water quality emphasis elements and include additional information to demonstrate consistency with Clean Water Act requirements. We also provided recommendations relating to implementation and administration, unauthorized routes, dispersed camping, and, climate change.

Our first water quality emphasis element recommendation was, "Open only those routes which are consistent with WWNF forest plan S&Gs and BMPs."¹ We provided an explanation and example related to this recommendation on page 6 of our DEIS comments. While we continue to believe that only those routes which are consistent with Forest Plan Standards and Guidelines (S&Gs) and Best Management Practices (BMPS) would best protect water quality, we respect the Forest's perspective that adherence to such a goal was not possible within the scope and scale of this project.² As you move into the implementation phase, we support and encourage all of the Forest's ongoing efforts to: (i) close routes which are not consistent with Forest Plan S&Gs and BMPs; (ii) identify a minimum system, and, (iii) decommission unnecessary roads and trails that are causing resource damage.

Otherwise, our review finds that the FEIS is responsive to our recommendations. Most notably, we agree that the selected alternative is relatively more protective of water quality. Alternatives 1, 3 or 4 would be less protective than the selected alternative because, for example, they would take much longer to

¹ See page 3 at: [http://yosemite.epa.gov/oeca/webeis.nsf/\(PDFView\)/20090190/\\$file/20090190.PDF?OpenElement](http://yosemite.epa.gov/oeca/webeis.nsf/(PDFView)/20090190/$file/20090190.PDF?OpenElement)

² FEIS, page I-30, "H"

comply with the Upper Grande Ronde Total Maximum Daily Load.³ Reducing total miles of designated routes in Riparian Habitat Conservation Areas by at least 870 miles and total stream crossings by 7,956 will indeed result in a significant reduction in sediment delivery to streams in the project area. This information along with other new facts, analysis and conclusions in the FEIS (E.g., p. 190-191 and Appendix I) and Record of Decision address our recommendation for additional information to demonstrate consistency with Clean Water Act requirements.

The Forest was also responsive to our Draft EIS comments by incorporating: (i) all of alternative 5's monitoring and implementation elements into the selected alternative; and, (ii) BMPs from the 2010 Forest Service National Core Best Management Practices edited for application to the Wallowa Whitman National Forest Travel Management Plan.

We appreciate your substantial efforts to respond to the EPA's comments and concerns regarding this project as well as those from members of the public and other agencies. If you have any questions please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or you may contact Erik Peterson of my staff at (206) 553-6382 or by electronic mail at peterson.erik@epa.gov.

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

³ FEIS, page 190